

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 20-06002-01-CR-SJ-DGK

CLINT ROBERT SCHRAM

Defendant.

NOTICE AND BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

The United States of America hereby files the following Notice and Bill of Particulars for Forfeiture of Property.

The forfeiture allegation pending in this case seeks forfeiture set forth in Counts One through Nine of any visual depiction described in Title 18, United States Code, Sections 2251 or 2252A, or any film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of these sections; any property, real or personal, constituting or traceable to gross profits or proceeds obtained from such offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses.

The United States hereby gives notice that it is seeking forfeiture of the following property:

- a. Vantec, NexStar TX, Model NST-328S3-BK, hard drive, serial number 0673609947, with power cord;
- b. Western Digital, WD Elements, hard drive, serial number WX21D57R7UED, with cord;
- c. HP Pavilion tower, Model 510-P114, serial number CNV63707Q0;

- d. Raspberry Pi 4, Model B Computer, FCCID 2ACB-RPI4B, with power cord and video cable;
- e. HP laptop, with ProtectSmart, serial number 5CD53057LK, with power cord;
- f. G.Skill Micro SD Adapter with G.Skill 32 GB Micro SD card, serial number CDBAJK123770;
- g. SanDisk Ultra Plus 32 GB Micro SD card, serial number 9227ZV0V305N;
- h. CanaKit Micro SD reader with Samsung Evo Plus Micro SD card, 32 GB;
- i. 2 thumb drives - 1 PNY 64 GB USB 3.0, 1 GorillaDrive;
- j. 29 optical discs; and
- k. Gray Samsung Galaxy S8 cell phone, Model SM-G950U, IMEI 358332084452353, with black Otterbox case

as proceeds directly traceable to the violations alleged in Counts One through Nine or used to commit or to facilitate the violations alleged in Counts One through Nine of the Indictment.

Respectfully submitted,

Timothy A. Garrison
United States Attorney

By

/s/ Alison D. Dunning
Alison D. Dunning
Assistant United States Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2021, the foregoing motion was electronically filed with the Clerk of the Court using the CM/ECF system for electronic delivery to all counsel of record.

/s/ Alison D. Dunning

Alison D. Dunning

Assistant United States Attorney